

Morris James LLP

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July 30, 2007

VIA E-FILING

The Honorable Mary Pat Thyng
United States District Court
Federal Building
844 King Street
Wilmington, DE 19801

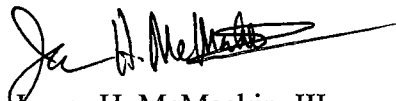
RE: *Ford v. Christiana Care Health Systems, et al.*
C.A. Nos. Consolidated 06-301-MPT and 06-458-MPT

Dear Judge Thyng:

Enclosed is a courtesy copy of Defendants' Response to Request No. 7 set forth in Plaintiff's Second Motion for Extension of Discovery Cut-off Deadline. This document is being submitted to you upon your request as stated in the June 29, 2007 telephone conference with counsel and Ms. Ford.

Please do not hesitate to contact us if you have any questions.

Respectfully,



James H. McMackin, III

JHM/jam
Enclosure

cc: Ms. Stephanie Ford (w/enc). – via U.S. Mail
Thomas S. Bloom, Esquire (w/enc.) – via e-mail
Clerk of the Court – via e-filing

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEPHANIE LYNN FORD,)	
)	
Plaintiff,)	
)	
v.)	Consolidated
)	Civil Action Nos.
)	06-301-MPT; 06-458-MPT
CHRISTIANA CARE HEALTH)	
SYSTEMS, RICHARD BURTON,)	
and CLARA CLARK,)	
)	
Defendants.)	

**DEFENDANTS' RESPONSE TO REQUEST NO. 7 SET FORTH IN PLAINTIFF'S
SECOND MOTION FOR EXTENSION OF DISCOVERY CUT-OFF DEADLINE**

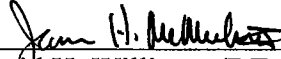
In accordance with the Court's June 29, 2007 Order directing Defendants to respond in the form of an interrogatory response to Request No. 7 set forth in Plaintiff Stephanie Ford's Second Motion for Extension of Discovery Cut-Off Deadline (Docket No. 70), Defendants, by and through their attorneys, hereby respond as follows.

REQUEST NO. 7: Please produce the reason the Plaintiff was denied 29 jobs at Christiana Care Health Systems.

RESPONSE: Defendants object to this request because, in light of the fact that all of Plaintiff's claims are time-barred and fail as a matter of law for the reasons set forth in Defendants' Summary Judgment Brief, Docket No. 54, Plaintiff's Request No. 7 seeks information that is not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence. However, subject to and without waiver of the foregoing objections, Christiana Care states that Plaintiff applied for 27 positions during the period May 21, 2004 through June 25, 2004. The following is a list of the 27 positions for which Plaintiff applied and the reasons Plaintiff was not selected for any of those positions:

<u>Position</u>	<u>Outcome</u>
1. Team Coordinator	Position awarded to candidate more qualified than Plaintiff.
2. Unit Clerk VI	Position awarded to candidate more qualified than Plaintiff.
3. Patient Information Rep I	Position canceled – no one was hired.
4. Patient Care Technician	Position awarded to Christiana Care employee more qualified than Plaintiff.
5. Lab Receiving Clerk	Position awarded to candidate more qualified than Plaintiff.
6. Clerk V - Facilities Engineering	Position awarded to candidate more qualified than Plaintiff.
7. Unit Clerk VI	Position awarded to candidate more qualified than Plaintiff.
8. Clerk VI - Heart & Vascular Center	Position awarded to Christiana Care employee more qualified than Plaintiff.
9. Duplicator	Position awarded to Christiana Care employee more qualified than Plaintiff.
10. Health Records Clerk	Position awarded to candidate more qualified than Plaintiff.
11. OR Tech Evenings	Position awarded to candidate more qualified than Plaintiff.
12. Administrative Assistant II	Position awarded to Christiana Care employee more qualified than Plaintiff.
13. Clerk VI – 40D	Position awarded to Christiana Care employee more qualified than Plaintiff.
14. Unit Clerk VI	Position awarded to Christiana Care employee more qualified than Plaintiff.
15. Career Development	Position awarded to candidate more qualified than Plaintiff.

16. Home Health Assistant	Position awarded to candidate more qualified than Plaintiff.
17. Clerk VI	Position awarded to Christiana Care employee more qualified than Plaintiff.
18. Consignment Assistant	Position awarded to candidate more qualified than Plaintiff.
19. Service Assistant II	Position awarded to candidate more qualified than Plaintiff.
20. Scheduler	Position awarded to Christiana Care employee more qualified than Plaintiff.
21. Home Health Assistant Training Program	Position awarded to candidate more qualified than Plaintiff.
22. Home Health Assistant Training Program	Position awarded to candidate more qualified than Plaintiff.
23. Security Officer	Position awarded to candidate more qualified than Plaintiff.
24. Residency Program Assistant	Position awarded to candidate more qualified than Plaintiff.
25. Collections Specialist	Position canceled – no one was hired.
26. Home Health Assistant	Position canceled – no one was hired.
27. Exercise Technician	Position awarded to candidate more qualified than Plaintiff.



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Dated: July 30, 2007

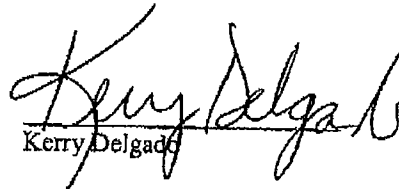
Attorneys for Defendants

07/30/2007 06:10 HUMAN RESOURCES → 818774329652

NO.900 009

VERIFICATION

I, Kerry Delgado, hereby verify that I am employed by Christiana Care Health Services as Director of Employee Relations, and that the facts set forth in the foregoing Defendants' Response To Request No. 7 Set Forth In Plaintiff's Second Motion For Extension Of Discovery Cut-Off Deadline are true and correct based upon knowledge and information provided to and/or obtained by me in the performance of my duties.


Kerry Delgado

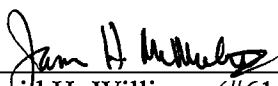
**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEPHANIE LYNN FORD,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CONSOLIDATED
	:	Civil Action No. 06-301-***
CHRISTIANA CARE HEALTH SYSTEMS,	:	Civil Action No. 06-458-***
RICHARD BURTON, and CLARA CLARK.	:	
	:	
Defendants.	:	

NOTICE OF SERVICE

I hereby certify that on the 30th day of July, 2007, two (2) copies of **DEFENDANTS' RESPONSE TO REQUEST NO. 7 SET FORTH IN PLAINTIFF'S SECOND MOTION FOR EXTENSION OF DISCOVERY CUT-OFF DEADLINE** were served by placing same in the United States Mail, postage prepaid, addressed to the following counsel of record:

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New Castle, DE 19720



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Dated: July 30, 2007

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